

PHILLIP A. TALBERT
United States Attorney
CHRISTINA McCALL
Assistant United States Attorney
501 I Street, Suite 10-100
Sacramento, CA 95814
Telephone: (916) 554-2700
Facsimile: (916) 554-2900

Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

TREVOR CLAYTON MORGAN,

Defendant.

CASE NO. 2:24-CR-0093 DC

REVISED STIPULATION REGARDING
EXCLUDABLE TIME PERIODS UNDER SPEEDY
TRIAL ACT; FINDINGS AND ORDER

TIME: 9:30 a.m.
COURT: Hon. Dena M. Coggins

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for status on November 12, 2024, with a time exclusion for effective preparation of counsel.

2. On October 8, the Chief District Judge re-assigned this case from District Judge Kimberly J. Mueller to District Judge Dena M. Coggins, vacated previously set court appearances, and instructed counsel to file a request to reset the hearing on Judge Coggins' calendar.

3. The parties request that all prior exclusions of time from computation under the Speedy Trial Act remain.

4. The parties jointly request that the status conference be set for December 13, 2024, and request to exclude time between November 12, 2024, and December 13, 2024 at 9:30 a.m. in Courtroom

8 before the Honorable Dena Coggins, under Local Code T4 and 18 U.S.C. §3161(h)(7)(A) and (h)(7)(B)(iv).

5. The parties agree and stipulate, and request that the Court find the following:

a) The government has represented that the discovery associated with this case includes over 600 pages/items of discovery. Those items include: business records; investigative reports; interviews; photographs; and search warrant documents. Additionally, defense counsel has reviewed some of the digital evidence in the case at the U.S. Attorney's office. The investigators in this case have submitted hundreds of files to the National Center for Missing and Exploited Children and are awaiting results.

b) A continuance is requested because counsel for both parties need additional time for effective preparation, to conduct legal research and further investigation into the alleged crimes.

c) Counsel for defendant believes the failure to grant a continuance in this case would deny defense counsel reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

d) The government joins in the request for the continuance.

e) Based on the above-stated findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.

f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of November 12, 2024 to December 13, 2024, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

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2 6. Nothing in this stipulation and order shall preclude a finding that other provisions of the
3 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial
4 must commence.

5 IT IS SO STIPULATED.

6 Dated: October 18, 2024

7 PHILLIP A. TALBERT
United States Attorney

8 /s/ CHRISTINA McCALL
9 CHRISTINA McCALL
10 Assistant United States Attorney

11 Dated: October 18, 2024

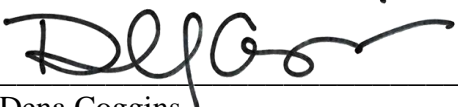
12 /s/ NOA OREN
13 NOA OREN
Assistant Federal Public Defender
14 Counsel for Defendant
TREVOR CLAYTON MORGAN

15
16 **~~PROPOSED~~ ORDER**

17 The Court has read and considered the parties' Stipulation. The Court ORDERS a Status
18 Conference set for December 13, 2024 at 9:30 a.m. in Courtroom 8 before the Honorable Dena Coggins.
19 The Court hereby finds that the Stipulation, which the Court incorporates by reference into this Order,
20 demonstrates facts that provide a basis to exclude time under the Speedy Trial Act pursuant to 18
21 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4]. Previous exclusions of time under the Speedy Trial
22 Act, including through November 12, 2024, are hereby incorporated into this Order. Time is excluded
23 under the Speedy Trial Act between November 12, 2024, and December 13, 2024.

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25 IT IS SO ORDERED.

26 Dated: October 21, 2024

27 
Dena Coggins
United States District Judge